

**CHRISTIAN MORRIS TRIAL ATTORNEYS**

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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

DANIELLE S. BRISSETT, an individual;  
ANTHONY HAMMOND JR., an individual;  
D.B., a minor by and through his natural  
mother and guardian DANIELLE S.  
BRISSETT; C.E., a minor by and through her  
natural mother and guardian DANIELLE S.  
BRISSETT; and L.B., a minor by and through  
her natural mother and guardian DANIELLE  
S. BRISSETT;

Plaintiffs,

vs.

ENTERPRISE LEASING COMPANY-WEST,  
LLC d/b/a ENTERPRISE RENT-A-CAR, a  
foreign limited liability company;  
ENTERPRISE HOLDINGS, INC., a foreign  
corporation, KINGS ROW TRAILER PARK,  
INC., a Nevada corporation; DOES 1 through  
10; ROE CORPORATIONS 13 through 20;  
and ABC LIMITED LIABILITY  
COMPANIES 21 through 30, inclusive,

Defendant(s).

CASE NO.: 2:24-cv-01382-BNW

**[PROPOSED] STIPULATION AND  
ORDER EXTENDING DISCOVERY  
DEADLINES (First Request)**

///

1 The above-named parties, by and through the undersigned counsel of record, hereby  
 2 submit this Stipulation and Order Extending Discovery Deadlines (First Request):

3 **DISCOVERY COMPLETED TO DATE**

4 Pursuant to FRCP 26(f) and LR 26-1(a), a meeting was conducted telephonically on  
 5 October 15, 2024; by Victoria R. Allen, Esq. of CHRISTIAN MORRIS TRIAL ATTORNEYS  
 6 for Plaintiffs, Eric W. Swanis, Esq. and Bethany L. Rabe, Esq. of GREENBERG TRAURIG, LLP  
 7 for Defendants ENTERPRISE LEASING COMPANY-WEST, LLC d/b/a ENTERPRISE RENT-  
 8 A-CAR and ENTERPRISE HOLDINGS, INC. On October 29, 2024, the Court entered a Joint  
 9 Discovery Plan and Scheduling Order [ECF 15]. The parties have completed the following  
 10 discovery:

11 1. Pursuant to FRCP 26(f), Plaintiffs produced their initial list of Witnesses and  
 12 Documents on November 12, 2024;

13 2. Pursuant to FRCP 26(f), Defendants produced initial list of Witnesses and  
 14 Documents on November 12, 2024;

15 3. Plaintiffs issued a Subpoena Duces Tecum to Las Vegas Metropolitan Police  
 16 Department on December 3, 2024;

17 4. Plaintiffs issued a Subpoena Duces Tecum to National Insurance Crime Bureau  
 18 on December 3, 2024;

19 5. Plaintiffs issued a Subpoena Duces Tecum to Wilkins Police Department on  
 20 December 3, 2024;

21 6. Plaintiffs served their First Supplemental Disclosures on December 20, 2024;

22 7. Defendants served Plaintiffs with written discovery requests on January 13, 2025;

23 8. Plaintiffs served their Second Supplemental Disclosures on January 27, 2025;

24 9. Plaintiffs served their first set of written discovery requests to Defendants on  
 25 February 14, 2025. Responses are pending;

26 10. Defendants issued a Subpoena Duces Tecum to DRS Consulting Group, LLC., on  
 27 February 26, 2025;

28 ///

11. Defendants issued a Subpoena Duces Tecum to Las Vegas Metropolitan Police Department on February 26, 2025;

12. Defendants issued a Subpoena Duces Tecum to Wilkins Township Police Department on February 26, 2025;

13. Plaintiffs served their responses to Defendants' first set of written discovery requests on February 26, 2025; the Parties have met and conferred in an effort to resolve some response issues.

### DISCOVERY THAT REMAINS TO BE COMPLETED

1. Plaintiffs anticipate:

- a. Plaintiffs' Deposition of Richard Newton, scheduled for April 9, 2025;
- b. Defendants' deposition of Randy Lamb, Wilkins Township Police Chief, scheduled for April 10, 2025;
- c. Depositions of fact witnesses and FRCP 30(b)(6) witnesses for Defendants and experts (TBD);
- d. Further written discovery (TBD);
- e. Expert Disclosures;

2. Defendants anticipate:

- a. Further written discovery (TBD);
- b. Depositions of fact witnesses (including the FRCP 30(b)(6) witnesses for the Nevada and Pennsylvania police departments and the third party entity that located the vehicle in Plaintiff Brissett's possession), the parties, and experts (TBD);
- c. Expert Disclosures.

### REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED

The parties have been diligently working on discovery. However, due to the fact that many of the inciting issues occurred several years ago making it challenging to locate relevant documentation and requiring additional investigation to obtain potentially relevant documentation. Already, the parties have made their initial disclosures and supplements thereto, propounded and responded to written discovery, and issued multiple subpoenas in their ongoing

efforts to diligently conduct discovery in this matter. Additionally, the extension will allow the Parties to continue their recently-renewed settlement discussions, thereby preserving judicial and party resources.

Based on the above reasoning, the parties request that the Court extend the current discovery deadlines for ninety (90) days.

#### CURRENT DISCOVERY SCHEDULE

- |    |  |                           |
|----|--|---------------------------|
| 1. | <i>Discovery Cut-Off Date:</i>                 | <i>July 28, 2025</i>      |
| 2. | <i>Amending the Pleadings /Adding Parties:</i> | <i>July 25, 2025</i>      |
| 3. | <i>Initial Expert Disclosure:</i>              | <i>May 29, 2025</i>       |
| 4. | <i>Rebuttal Expert Disclosure:</i>             | <i>June 30, 2025</i>      |
| 5. | <i>Dispositive Motions:</i>                    | <i>August 27, 2025</i>    |
| 6. | <i>Joint Pre-Trial Order:</i>                  | <i>September 26, 2025</i> |

#### PROPOSED DISCOVERY SCHEDULE

- |    |   |                    |
|----|---|--------------------|
| 1. | Discovery Cut-Off Date:                 | October 24, 2025   |
| 2. | Amending the Pleadings /Adding Parties: | July 25, 2025      |
| 3. | Initial Expert Disclosure:              | August 25, 2025    |
| 4. | Rebuttal Expert Disclosure:             | September 24, 2025 |
| 5. | Dispositive Motions:                    | November 24, 2025  |
| 6. | Joint Pre-Trial Order:                  | December 23, 2025  |

Note: if Dispositive Motions are timely filed, the deadline for filing the Joint Pre-Trial Order will be suspended until thirty (30) days after the decision on the Dispositive Motions or further Order of the Court.

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: April 9, 2025

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Submitted by:

DATED this 7<sup>th</sup> day of April 2025.

CHRISTIAN MORRIS TRIAL ATTORNEYS

/s/ Victoria R. Allen

CHRISTIAN M. MORRIS, ESQ.

Nevada Bar No. 11218

VICTORIA R. ALLEN, ESQ.

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*Attorneys for Plaintiffs*

DATED this 7<sup>th</sup> day of April 2025.

GREENBERG TRAURIG, LLP.

/s/ Eric W. Swanis

ERIC W. SWANIS, ESQ.

Nevada Bar No. 6840

BETHANY L. RABE, ESQ.

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10845 Griffith Peak Drive, Suite 600

Las Vegas, Nevada 89135

*Attorneys for Enterprise Leasing*

*Company-West, LLC. d/b/a Enterprise*

*Rent-A-Car, and Enterprise Holdings, Inc.*

**CERTIFICATE OF SERVICE**

Pursuant to Rule 5(b) of the Federal Rules of Civil Procedure, I hereby certify under penalty of perjury that I am an employee of CHRISTIAN MORRIS TRIAL ATTORNEYS and that on the 7<sup>th</sup> day of April 2025, the foregoing **[PROPOSED] STIPULATION AND ORDER EXTENDING DISCOVERY DEADLINES (First Request)** was served upon the parties via the Court's e-Filing and service program, addressed as follows:

Eric W. Swanis, Esq.

Bethany L. Rabe, Esq.

GREENBERG TRAURIG, LLP

10845 Griffith Peak Drive, Suite 600

Las Vegas, Nevada 89135

*Attorneys for Defendants Enterprise Leasing Company-West, LLC dba Enterprise Rent-A-Car and Enterprise Holdings, Inc.*

/s/ Jasmine Salado

An employee of CHRISTIAN MORRIS TRIAL ATTORNEYS

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